

**FORM  
INSP**Rev  
X/15**State of Colorado  
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

08/14/2018

Submitted Date:

08/20/2018

Document Number:

682503738**FIELD INSPECTION FORM**Loc ID 387156 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 10422Name of Operator: PRONGHORN OPERATING LLCAddress: 8400 E PRENTICE AVENUE #1000City: GREENWOOD State: CO Zip: 80111**Status Summary:**

- ☒
- THIS IS A FOLLOW UP INSPECTION
- 
- ☒
- FOLLOW UP INSPECTION REQUIRED
- 
- ☐
- NO FOLLOW UP INSPECTION REQUIRED

**Findings:**4 Number of Comments1 Number of Corrective Actions

- ☒
- Corrective Action Response Requested

**Contact Information:**

Contact Name	Phone	Email	Comment
		jim.thorson@catamountexploration.com	
		jakeflora@kfrcorp.com	
		zane.kuenzler@kfrcorp.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
218286	WELL	PA	06/25/2015	DA	073-06271	Stegas 23-15 1	RI

**General Comment:**

This is a follow-up final reclamation and stormwater inspection to inspection #682503359.

This is also a follow-up inspection in response to a 1001.c, 502.b reclamation variance request. Operator submitted doc. #401270387 on 03/14/2018 requesting that ~0.35 miles of access road be left un-reclaimed and a cattle guard remain in place per the request of the surface owner. This inspection is to identify the current conditions of the location and/or any concerns that may exist, and is part of the detailed technical review process per the "1001.c: Reclamation Variances and Waivers" operator guidance document. Please refer to the guidance document for additional details.

Please note that the submission of a variance request does not guarantee approval. The COGCC will provide notice to Pronghorn Operating LLC once an official decision has been made.

All portions of the location not included in the variance request remain under COGCC jurisdiction until passing final reclamation; any corrective action(s) from previous inspections that have not been addressed will remain applicable.

Inspected Facilities									
Facility ID:	218286	Type:	WELL	API Number:	073-06271	Status:	PA	Insp. Status:	RI

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**Reclamation - Storm Water - Pit****Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: \_\_\_\_\_

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND  
SEGREGATION \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1003a. Waste and Debris removed? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Unused or unneeded equipment onsite? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Pit, cellars, rat holes and other bores closed? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Guy line anchors marked? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1003b. Area no longer in use? \_\_\_\_\_ Production areas stabilized ? \_\_\_\_\_

1003c. Compacted areas have been cross ripped? \_\_\_\_\_

1003d. Drilling pit closed? \_\_\_\_\_ Subsidence over on drill pit? \_\_\_\_\_

Cuttings management: \_\_\_\_\_

1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? \_\_\_\_\_

Production areas have been stabilized? \_\_\_\_\_ Segregated soils have been replaced? \_\_\_\_\_

**RESTORATION AND REVEGETATION**Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ 80% Revegetation \_\_\_\_\_

## 1003e. INTERIM VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_

TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_

TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_

VEGETATIVE COVER \_\_\_\_\_

1003 f. Weeds Noxious weeds? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_ Date \_\_\_\_\_

Overall Interim Reclamation

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: \_\_\_\_\_

Reminder: \_\_\_\_\_

Comment: \_\_\_\_\_

Well plugged \_\_\_\_\_ Pit mouse/rat holes, cellars backfilled \_\_\_\_\_

Debris removed **Fail** \_\_\_\_\_ No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded \_\_\_\_\_ Contoured \_\_\_\_\_ Culverts removed \_\_\_\_\_

Gravel removed \_\_\_\_\_

Location and associated production facilities reclaimed **Fail** \_\_\_\_\_ Locations, facilities, roads, recontoured \_\_\_\_\_

Compaction alleviation \_\_\_\_\_ Dust and erosion control **Fail** \_\_\_\_\_

Non cropland: Revegetated 80% **Fail** \_\_\_\_\_ Cropland: perennial forage \_\_\_\_\_

Weeds present \_\_\_\_\_ Subsidence \_\_\_\_\_

## 1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_

TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_

TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_

VEGETATIVE COVER \_\_\_\_\_

Comment:

<p>Inspections #673503939 dated 12/13/2016, and #682503359 dated 5/15/2018 documented that location did not meet reclamation requirements and required additional reclamation activities to be conducted. Inspection #682503359 also documented pipe and various equipment/debris remaining on the northern end of the location and required removal.</p> <p>Operator has not submitted notice that corrective actions have been addressed or completed; pipe and equipment remain on the north end of the location. Unable to find evidence that additional reclamation activities have been conducted per the corrective action. Germination surveys were conducted indicating an average of &lt;1 seedling per square foot (0.148 seedling/ft<sup>2</sup>, or 0.8 seedlings/m<sup>2</sup>).</p>		Date <b>06/16/2018</b>
Corrective Action:	<p>Original corrective action and date remains applicable; Remove equipment and any various debris remaining on location and perform reclamation in accordance to COGCC 1000 series rules on the LOCATION and establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of predisturbance or reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until Final Reclamation has passed.</p>	
Overall Final Reclamation	<b>Fail</b>	Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>

**COGCC Comments**

Comment	User	Date
<p>COMMENTS COPIED FROM INSPECTION #682503359</p> <p>Form 6s #400860182 shows plugging date of 06/25/2015.</p> <p>Inspection doc. #673503939 dated 12/13/2016 failed reclamation of the location and access road, and required operator to "Remove the cattle guard and gate. Regrade and reclaim the access road. Reseed and control weed growth at the location to facilitate desirable vegetation establishment" by 04/01/2017. It is noted 1004.a requires final reclamation to be completed within twelve (12) months on non-crop land after plugging a well. Reclamation should have been conducted by 6/25/2016.</p> <p>On 06/05/2017, operator submitted a 502.b variance request to waive performing reclamation on the access road. Variance was submitted two (2) months after the corrective action date per inspection #673503939. During the initial completeness check it was determined that the minimum required information needed to process the request was not provided. Operator was notified and a sundry was returned to draft on 6/13/2017. Operator re-submitted the sundry nine (9) months later on 3/14/2018.</p> <p>502.b variance request appears to be in response to a corrective action inspection.</p> <p>The 502.b variance is requesting that ~0.35 miles of access road be left un-reclaimed and a cattle guard remain in place per the request of the surface owner.</p> <p>Variance request will not be approved until corrective actions have been addressed.</p>	trujilloam	08/20/2018
	trujilloam	08/20/2018

**Attached Documents**

You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
682503739	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4556746">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4556746</a>
682503740	Germination Survey	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4556747">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4556747</a>